### IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Case # 16-23697-CMB

CARMEN D. FUSCA,

Chapter 11

Debtor(s).

#### **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, RICHLAND TOWNSHIP, is a creditor and hereby appears in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by that Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

Jeffrey R. Hunt, Esquire GOEHRING, RUTTER & BOEHM 437 Grant Street, 14<sup>th</sup> Floor Pittsburgh, PA 15219-6107 TEL: (412)281-0587

FAX: (412)281-6570

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct.

Case 16-23697-CMB Doc 56 Filed 02/10/17 Entered 02/10/17 12:58:53 Desc Main Document Page 2 of 4

PLEASE TAKE FURTHER NOTICE that Richland Township intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) its right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which it its or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

GOEHRING, RUTTER & BOEHM,

Dated: <u>02/10/17</u>

/s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 437 Grant Street, 14<sup>th</sup> Floor Pittsburgh, PA 15219-6107 (412)281-0587 Attorney for Movant jhunt@grblaw.com Case 16-23697-CMB Doc 56 Filed 02/10/17 Entered 02/10/17 12:58:53 Desc Main Document Page 3 of 4

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#### **DECLARATION IN LIEU OF AFFIDAVIT**

I certify that this request supersedes any prior request for Notice by this creditor, that there is no other request to receive Notices for the specified creditor, and that I am authorized to make this request for Notices on behalf of the named creditor.

GOEHRING, RUTTER & BOEHM,

/s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 437 Grant Street, 14<sup>th</sup> Floor Pittsburgh, PA 15219-6107 (412)281-0587 Attorney for Movant jhunt@grblaw.com Case 16-23697-CMB Doc 56 Filed 02/10/17 Entered 02/10/17 12:58:53 Desc Main Document Page 4 of 4

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# <u>CERTIFICATE OF MAILING OF NOTICE OR OTHER DOCUMENT TO PARTIES IN INTEREST</u>

Donald R. Calaiaro, Esq. Calaiaro Valencik 428 Forbes Ave., Suite 900 Pittsburgh, PA 15219

Office of the United States Trustee Suite 970, Liberty Center 1001 Liberty Avenue Pittsburgh, PA 15222

> Ronda J. Winnecour, Esq. Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

> > GOEHRING, RUTTER & BOEHM,

/s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 437 Grant Street, 14<sup>th</sup> Floor Pittsburgh, PA 15219-6107 (412)281-0587 Attorney for Movant jhunt@grblaw.com